

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS DIVISION**

<b>PAUL LAMBERT, et al.</b>	)	
<b>on behalf of themselves and</b>	)	
<b>all others similarly situated,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>Case No. 3:16-cv-513-MJR-RJD</b>
	)	
<b>v.</b>	)	
	)	<b>Judge Michael Reagan</b>
<b>ALEXANDER COUNTY HOUSING</b>	)	
<b>AUTHORITY, JAMES WILSON,</b>	)	
<b>and MARTHA FRANKLIN,</b>	)	<b>Magistrate Judge Reona J. Daly</b>
<b>an Illinois municipal corporation,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFFS' COUNSEL'S MOTION TO WITHDRAW  
AS ATTORNEY OF RECORD FOR CORETTA CORNELIUS**

Plaintiffs' counsel of record, Hughes Socol Piers Resnick & Dym and the Sargent Shriver National Center on Poverty Law, ask the Court for an Order granting permission to withdraw as counsel representing plaintiff Coretta Cornelius, stating in support as follows.

1. On January 11, 2017, plaintiffs filed a Second Amended Complaint adding Coretta Cornelius as party plaintiff to the above-captioned case.
2. On May 5, 2017, the Court held a settlement conference in this matter. The day before the settlement conference, on May 4, 2017, plaintiffs' counsel met with most of the plaintiffs, including Ms. Cornelius, to discuss strategy for the May 5 settlement conference.
3. Plaintiffs' counsel advised all plaintiffs attending the May 4 meeting that they must board a bus at 8:30 a.m. the following day to travel to Benton, Illinois.
4. On the morning of May 5, Ms. Cornelius refused to board the bus or otherwise attend the settlement conference.

5. On May 5, plaintiffs' counsel repeatedly called Ms. Cornelius and knocked on her door, but she refused to participate in the settlement conference.

6. There has been a breakdown in the attorney-client relationship between Ms. Cornelius and plaintiffs' counsel.

7. In addition, now that the other thirty plaintiffs are close to settling their claims with defendants, there is a conflict of interest between Ms. Cornelius and the other thirty plaintiffs. Accordingly, plaintiffs' counsel request permission to withdraw from representing Ms. Cornelius.

8. The last known addresses of Ms. Cornelius is as follows:

Coretta Cornelius  
702 McBride  
Cairo, IL 62914

9. Pursuant to Local Rule 83.1(g), plaintiffs' counsel will provide notice of this motion to Ms. Cornelius by sending a copy of the motion by certified mail. A cover letter will inform Ms. Cornelius that she should retain other counsel and that within 21 days of the entry of the order of withdrawal, the party or the new counsel shall file with the Clerk of Court a supplementary appearance that provides an address at which the party or the new counsel may receive service of documents related to the case.

WHEREFORE, Plaintiff's counsel, Christopher Wilmes, Charles Wysong, Katherine Walz, Emily Coffey, and Kevin Herrera ask the Court to grant their motion and permit them to withdraw from representing Ms. Cornelius.

By: /s/ Christopher J. Wilmes  
One of the Attorneys for Plaintiffs

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2017 I electronically filed the attached Plaintiffs' Counsel's Motion to Withdraw as Attorney of Record for Coretta Cornelius with the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF Registrants:

Stephen J. Moore  
Jessica B. Cozart  
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/s/ Christopher J. Wilmes  
One of the Attorneys for Plaintiffs